

Ainsworth Declaration Exhibit A

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STARK *et al*,

Plaintiffs,

v.

THE SEATTLE SEAHAWKS, FOOTBALL
NORTHWEST LLC, *et al.*,

Defendants.

No. CV06-1719 JLR

DECLARATION OF PAUL SCHIECK

DECLARATION OF PAUL SCHIECK

I. Background

1. My name is Paul Schieck. I am over the age of eighteen years and am competent to testify on the matters set forth herein. I make this declaration based on my personal knowledge and belief.

2. Since December 2005, I have been employed by First & Goal, Inc. ("FGI") as Assistant General Manager. My responsibilities include overseeing security, including the mandatory pat-down program for Seattle Seahawks games, at Qwest Field.

3. I have been employed as a security professional in the public assembly business for 22 years. I am certified by the American Society for Industrial Security as a

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Case No. CV06-1719 JLR

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Washington, DC 20004
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1 Certified Protection Professional and have been since 1996. I am also certified by the
2 International Association of Assembly Managers as a Certified Facility Executive.

3 4. Since 2003, I have served as a faculty member and instructor at the Academy
4 for Venue Safety and Security, a school for facility professionals. I have also served as a
5 committee member and as chairman of the International Crowd Management Conference, an
6 annual seminar dealing with managing crowds in public assembly facilities.

7 5. Under a master lease agreement with the Washington State Public Stadium
8 Authority ("PSA"), FGI, a privately held company, has exclusive authority and responsibility for
9 operations at Qwest Field and the Qwest Event Center, including security. Neither PSA nor its
10 employees participate in the management or operation of Qwest Field, including security.

11 **II. Security Procedures at Qwest Field on NFL Game Days.**

12 6. Qwest Field is subject to twenty-four hour security on a year-round basis.
13 That security is heightened prior to and during Seattle Seahawks games. Qwest Field's security
14 procedures are based on the NFL's Best Practices for Stadium Security.

15 7. Game day security procedures commence with a lock-down of the facility
16 several hours prior to the opening of Qwest Field's gates. At that time, law enforcement,
17 together with stadium and contract security employees, conducts a security sweep of the facility
18 using K9 units. Deliveries to the stadium are not permitted after lockdown except on an
19 emergency basis approved by a member of FGI's senior management team. Removable bollards
20 are placed at both the north and south access road entrances. Security officers are posted on the
21 perimeter of the facility and a roving patrol team monitors the facility itself. The parking garage
22 adjacent to the Qwest Event Center is checked for suspicious vehicles. Vehicles entering
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1 parking lots within the 100 foot perimeter are visually inspected, logged in, and tagged with a
2 color coded system.

3 8. A game day command post is located at the stadium and is staffed by law
4 enforcement, fire/EMS, stadium management, and Seahawks representatives. A direct line to the
5 Federal Aviation Administration is available.

6 9. Access to the facility on game day is tightly controlled. No one working at
7 the stadium may be admitted unless his or her name is on a previously approved list. Those
8 working at the stadium -- 640 personnel comprised of FGI employees, private security
9 contractors, off-duty uniformed police officers, and fire department personnel -- must wear either
10 a credential or a color-coded wrist band in the facility.

11 10. On game day, the entry gates and points of access are staffed by FGI
12 employees and a third-party security vendor hired by FGI. PSA is not a party to these vendor
13 contracts, has no role in selecting the vendor, and has no responsibility for the costs.

14 11. The current security vendor, Staff Pro, provides approximately 180 employees
15 to conduct visual inspections of bags and pat-downs (on a same-gender basis). Staff Pro hires
16 licensed private security guards to perform the security screenings. FGI employees scan or tear
17 the tickets at the gates.

18 12. The stadium security policies for Seattle Seahawks games are in accordance
19 with guidelines and requirements provided by the Seahawks and the NFL. These policies are
20 posted for the public on the Qwest Field and Seattle Seahawks' websites.

21 **III. The NFL Pat-Down Requirement**

22 13. When I joined FGI in December 2005, I learned that in August 2005, the
23 Seattle Seahawks had informed FGI of the NFL's policy requiring limited upper body pat-downs
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1 of all persons entering the stadium on game day. In compliance with the Seattle Seahawk's
 2 direction, FGI implemented the pat-down requirement in accordance with NFL guidelines.

3 14. NFL guidelines recommend a screening procedure that consists of a bag
 4 inspection, visual inspection, and limited pat-down of each person seeking entry to the stadium.
 5 Each of these inspections takes approximately five to ten seconds. (Bag searches are not a new
 6 requirement and have been mandatory for persons attending Seattle Seahawks games since
 7 2001.) The physical portion of the inspection consists of touching, patting, or lightly rubbing
 8 specified clothed portions of the subject's upper body, including the arms, torso, beltline, and the
 9 person's back along the spine. The inspection is performed by a screener of the same gender as
 10 the person being inspected. Security personnel are directed to touch only clothed areas and to
 11 avoid skin-to-skin contact with the subject. FGI directs its security vendor to implement the
 12 standard screening procedure recommended by the NFL for all Seattle Seahawks games.
 13

14 15. PSA has not participated in any way in the development, implementation or
 15 administration of pat-down inspections for Seattle Seahawks games at Qwest Field. Likewise,
 16 local law enforcement agencies have not participated in the development, implementation or
 17 administration of the pat-down inspections.
 18

19 16. Seattle Seahawks tickets advise that compliance with stadium security
 20 measures is a condition of admission to games. Exhibit A is a copy of the language appearing on
 21 each ticket. The 2006 season tickets state:

22 You and your belongings may be searched upon entry into Qwest
 23 Field, and prohibited items may be confiscated. By tendering this
 24 ticket and entering Qwest Field, you consent to such searches and
 25 waive any related claims you might have against the NFL, its
 26 Member Clubs, its affiliates, Seahawks, First & Goal and their
 agents. If you elect not to consent to those searches, you will be
 denied entry into Qwest Field.

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1 17. Prior to the August 22, 2005 game and throughout the 2005 Season, the
2 Seattle Seahawks notified the public that pat-downs would be required of everyone entering
3 Qwest Field for Seahawks home games. FGI and/or the Seattle Seahawks issued press releases,
4 which were reported in the local press; sent emails to all season ticket holders and other fans;
5 posted notices on the Qwest Field and Seattle Seahawks' websites; posted signs at all entrances
6 to the stadium; and played audio announcements over stadium loudspeakers. Attached as
7 Exhibit B are copies of press releases from the Seattle Seahawks advising the public of the pat-
8 down policy. Attached as Exhibit C are copies of local news articles from August and
9 September 2005 advising ticket holders of the pat-down policy.
10

11 18. Security screeners are instructed to conduct the pat-down inspections on a
12 consent basis only. If a ticket holder declines to consent to the inspection procedures, the
13 security screeners are trained to direct the ticketholder to a supervisor who can explain the
14 screening requirement.
15

16 19. Since August 2005, no ticketholder has requested a refund of his or her ticket
17 because he or she did not want to be patted down.
18

19 20. Security screeners are trained in accordance with FGI and NFL guidelines.
20 In addition, FGI instructs its security vendor to be prepared to implement a heightened security
21 screening that involves a more thorough full body pat-downs in the event that FGI determines
22 that a higher-level of security is warranted for a particular event. This heightened security
23 procedure has not been used at any Seattle Seahawks games. Attached as Exhibits D and E are
24 copies of documents prepared for use in training security screeners at Qwest Field.
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1 21. I understand that plaintiffs have alleged that pat-downs are conducted at
2 Qwest Field only at Seattle Seahawks games. This is not correct. In addition to Seattle
3 Seahawks games, pat-downs are required for Washington State University football games, and
4 the annual "Battle in Seattle" game between Central Washington University and Western
5 Washington University. Pat-downs may also be conducted at other events at Qwest Field on an
6 event-by-event basis, ordinarily after consultation between FGI and the event promoter.

7 22. I understand that plaintiffs have alleged that on one occasion in 2005, pat-
8 downs were suspended because of the weather. I have investigated this allegation and
9 determined that the allegation is incorrect. On one occasion in 2005, pat-downs were suspended
10 because a large crowd had accumulated at the gates just prior to the start of the game which
11 overwhelmed the security staff managing the gates and performing security screenings. Due to
12 the need to maintain appropriate crowd control, stadium security suspended the pat-down
13 inspections for the fans who had not yet entered the stadium for that single game. Improved
14 planning, better training of security personnel, and increased ticket holder familiarity with pat-
15 down procedures have resulted in more effective crowd management at subsequent games.

16 23. I understand that plaintiffs have alleged that on one occasion, a security
17 screener touched one of the plaintiffs in an offensive manner. As stated above, FGI employs a
18 private security company which hires licensed private security guards to implement our
19 screening procedures. The security screeners are trained according to clear guidelines for
20 conducting the pat-downs, including limiting the scope of the pat-down to the torso, back, and
21 arms. Security screeners are directed not to make skin-on-skin contact during the pat-down, to
22 screen only persons of the same gender, and to be sensitive when screening young children and
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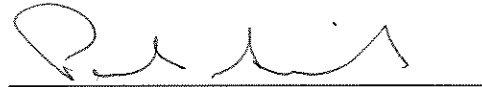
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1 individuals with physical disabilities. If FGI learned that any of its employees (or its security
2 contractor's employees) intentionally touched a ticketholder in an offensive manner, we would
3 address such behavior immediately; we were unaware of the incident alleged by plaintiff until
4 this lawsuit was filed.

5 I declare under penalty of perjury that the foregoing is true and correct.

6
7 January 23, 2007



8 Paul Schieck

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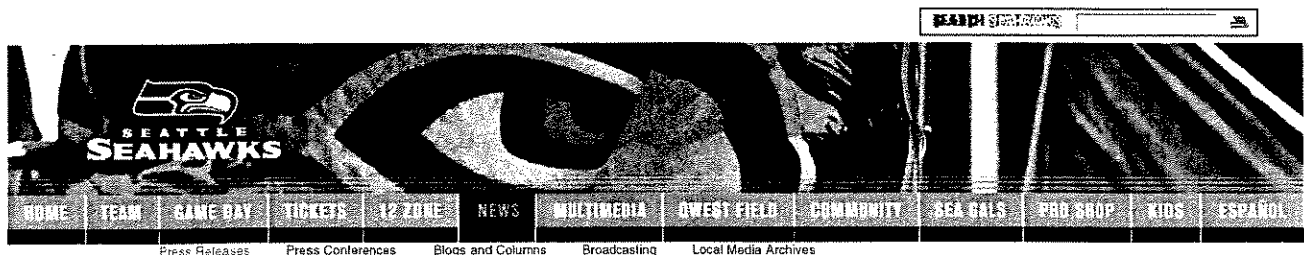
Exhibit A

2006 TICKET TERMS

This ticket only grants entry into Qwest Field and a spectator seat for the specified NFL game, activity or other event ("Events"). Admission may be refused or ticket holder ejected at the sole discretion of the Seattle Seahawks and/or First & Goal, master tenant of Qwest Field, subject to refund, or without refund if the ticket holder is deemed to be disorderly, or fails to comply with these terms, the Fan Code of Conduct or any and all security measures. Ticket holder assumes all risks incident to the Events, including the risk of lost, stolen or damaged property or personal injury. The ticket holder will not transmit or aid in transmitting any picture, account or description (whether text, data or visual) in any media now or hereafter existing of all or any part of the Events. The ticket holder grants to the NFL, the Seattle Seahawks, First & Goal and their designees the irrevocable permission to use his or her voice or likeness in any media now or hereafter existing in connection with all or any part of the Events, for any purpose whatsoever, including the commercial purposes of the NFL, the Seattle Seahawks, First & Goal and their sponsors, licensees, promoters, advertisers or broadcasters. All sales are final. This ticket cannot be replaced if lost, destroyed or stolen. Lost, stolen or counterfeit tickets may not be honored. The ticket holder may not enter the Events or otherwise use this ticket for advertising, promotion or other commercial purposes (including contests, sweepstakes and giveaways) without the NFL's, the Seattle Seahawks' or First & Goal's express written consent. THE DATE AND TIME OF THE GAME IS SUBJECT TO CHANGE BY THE NFL IN ACCORDANCE WITH ITS SCHEDULING POLICIES OR AS A RESULT OF OTHER ACTIONS OR EVENTS BEYOND THE NFL'S CONTROL. NO REFUND WILL BE PROVIDED IF TICKET HOLDER CANNOT ATTEND. You and your belongings may be searched upon entry into Qwest Field, and prohibited items may be confiscated. By tendering this ticket and entering Qwest Field, you consent to such searches and waive any related claims that you might have against the NFL, its Member Clubs, affiliates, Seahawks, First & Goal and their agents. If you elect not to consent to these searches, you will be denied entry into Qwest Field.

FGI 0001

Exhibit B



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Let's Build Something Together






Press Releases



Seahawks Announce Security Pat Downs; Limited Alcohol Sales

8/31/2005

In order to further enhance fan safety and comfort, everyone entering Qwest Field for 2005 Seattle Seahawks home games will be subject to pat down searches. Fans are encouraged to arrive early at stadium gates to help facilitate this additional security measure. All fans entering Qwest Field will be subject to and should expect to be patted down by security personnel before going through stadium gates. "Pat downs" of fans entering NFL stadiums have taken place on a frequent basis in recent years. Following discussion at a recent league meeting, Commissioner Paul Tagliabue and the NFL clubs determined that these hand searches should be a required element of stadium security procedures at all NFL games. "This new requirement is not a result of any specific threat information," said Commissioner Tagliabue. "It is in recognition of the significant additional security that 'pat downs' offer, as well as the favorable experience that our clubs and fans have had using 'pat downs' as part of a comprehensive stadium security plan." Several NFL teams successfully used pat downs as part of stadium security procedures last season. Hand searches of all fans entering stadiums also were employed during all NFL playoff games last season. Pat downs at stadium gates have been part of the Super Bowl security plan since 2002. Also occurring at this Friday evening's game vs. Minnesota will be the cut-off of alcohol sales at halftime, due to the game's late kickoff at 6 p.m. Fans are also encouraged to arrive 90 minutes early to avoid downtown traffic congestion.

RELATED CONTENT

-  Seahawks Report - Thursday (11/30/2006)
-  Seahawks Report - Wednesday (11/29/2006)
-  Seahawks at Broncos - Game Preview
-  Seahawks 34, Packers 24
-  Seahawks 34, Packers 24 - Notebook

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Prepared by 陈永平 陈永平 陈永平 陈永平 陈永平

FGI 0002

August 31, 2005

Seahawks Announce Security Pat Downs

Kirkland, Wa. -- In order to further enhance fan safety and comfort, everyone entering Qwest Field for 2005 Seattle Seahawks home games will be subject to pat down searches.

Fans are encouraged to arrive early at stadium gates to help facilitate this additional security measure. All fans entering Qwest Field will be subject to and should expect to be patted down by security personnel before going through stadium gates.

"Pat downs" of fans entering NFL stadiums have taken place on a frequent basis in recent years. Following discussion at a recent league meeting, Commissioner Paul Tagliabue and the NFL clubs determined that these hand searches should be a required element of stadium security procedures at all NFL games.

"This new requirement is not a result of any specific threat information," said Commissioner Tagliabue. "It is in recognition of the significant additional security that 'pat downs' offer, as well as the favorable experience that our clubs and fans have had using 'pat downs' as part of a comprehensive stadium security plan."

Several NFL teams successfully used pat downs as part of stadium security procedures last season. Hand searches of all fans entering stadiums also were employed during all NFL playoff games last season. Pat downs at stadium gates have been part of the Super Bowl security plan since 2002.

FGI 0003

To minimize downtown congestion due to outbound commuter traffic and inbound game traffic, fans are **STRONGLY URGED** to arrive at Qwest Field at least 90 minutes prior to kickoff to avoid parking delays and at the gates.

Kickoff vs. Minnesota is at 6:00 pm.

The Seahawks tailgate party, **Touchdown City**, opens at 3:00 pm. Touchdown City, an interactive theme park for football fans of all ages. Unique games, displays, football skill tests, and entertainment await fans inside the Qwest Event Center. Admission to Touchdown City is free. Food, beer, and wine are available for purchase.

Park and Rides

Regular service will operate from the five Seahawks Park and Ride locations prior to the game according to their usual weekday schedule. After the game, special Seahawks service will operate normal post-game routes back to the Park and Ride lots.

- **Pregame:** Metro buses on their normal daily schedule
- **Postgame:** Buses will operate on Seahawks postgame schedule with routes to the five designated Seahawks Park and Ride locations. **Click here** for a map of locations. Please create link to http://transit.metrokc.gov/up/spclevent/m_seahawks-post.html
- To plan you trip by Metro bus **click here**
- For more transportation options **click here** Please change link to <http://www.seahawks.com/subcontent.aspx?SecID=194>

For the safety and security of all guests, entry to all 2005 Seattle Seahawks games will include a **limited pat-down** as per NFL guidelines.

Remember fans, arrive early so you don't miss kickoff!

FGI 0004

Exhibit C

Westlaw.

NewsRoom

8/22/05 STLTI D1

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8/22/05 Seattle Times D1
2005 WLNR 13230017

Seattle Times (WA)
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August 22, 2005

Section: ROP Sports

Bledsoe still out to prove his worth

Chris Cluff; Seattle Times staff reporter

em>NEW START IN DALLAS | The former All-Pro has reunited with Bill Parcells in Dallas after three mainly trying seasons in Buffalo.

When Drew Bledsoe made his first professional on-field appearance in his home state last November at Qwest Field, he carried the burden of proving he could still perform as a starting quarterback after 11 years in the NFL.

Nine months later, he is back in Seattle and still trying to prove it - to a new team run by his old coach.

Jettisoned by the Buffalo Bills in February, Bledsoe returns to Seattle for his second exhibition start as a Dallas Cowboy when his new team plays the Seahawks to-night at Qwest Field on ABC's "Monday Night Football."

In just three years, Bledsoe's reputation in some NFL circles has gone from that of a record-setting, franchise savior to a stiff-legged, 33-year-old who has been passed over by a faster-paced NFL game.

That was the message the Bills sent when they released Bledsoe because he would not accept a demotion to back up the younger and more mobile J.P. Losman, who was Buffalo's first-round pick in 2004.

A day after Bledsoe was released, the former Washington State star from Walla Walla was signed by the Cowboys and reunited with Bill Parcells, the coach who had drafted him No. 1 overall for the New England Patriots in 1993. That pick is still lamented by some fans of the Seahawks, who drafted Rick Mirer No. 2 overall in 1993.

The Bledsoe-Parcells reunion is seen optimistically as a chance for both the quarterback and the coach to rise to glory again.

They were there once, when they led the Patriots to the Super Bowl in the 1996 season. They lost to Mike Holmgren's Green Bay Packers, and Parcells moved to the Jets.

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Bledsoe continued to start until 2001, when he suffered a serious chest injury and was supplanted by Tom Brady during New England's first Super Bowl run. After that season, Bledsoe was traded to the Bills, who hailed him as the savior for a team coming off a 3-13 season.

"When Drew got there, that team had not won. They were looking for something to hang their hat on," said Bledsoe's father, Mac, by phone this weekend. "Expectations were off the charts for his performance."

And Drew fed the frenzy that year, setting Bills records in attempts (610), completions (375) and yards (4,359).

But the Bills let go of some of Bledsoe's top targets - Peerless Price, Jay Riemersma, Larry Centers - and his numbers dropped significantly in 2003. Last year, the Bills fired coach Gregg Williams and brought in Mike Mularkey, who implemented a run-based offense.

When the Bills asked Bledsoe to relinquish the starting position, he was not happy about it. He felt he could still start and be successful in the league.

Parcells agreed and is gambling \$14 million over three years that a reunion with his one-time passing protege will benefit both the quarterback and the Cowboys.

Dallas has used seven quarterbacks since Troy Aikman, the leader of their 1990s Super Bowl teams, retired after the 2000 season. In Parcells' first season in Dallas (2003), he started the inconsistent Quincy Carter as the Cowboys surprisingly reached the playoffs. Then, last season, the coach went with his old New York Jets QB, Vinny Testaverde, and the team struggled to a 6-10 record - although one of the victories was a wild, 43-39 decision over the Seahawks on "Monday Night Football."

The Seahawks will see a slightly younger Dallas quarterback tonight - and again when it counts, on Oct. 23 - as Bledsoe replaces the 41-year-old Testaverde this season.

Bledsoe already has begun to re-establish chemistry with receiver Terry Glenn, his Patriots teammate from 1996 to 2001. He also has another veteran target in Keyshawn Johnson, who is another link to Parcells' past. And perhaps Bledsoe's best go-to guy will be tight end Jason Witten, who went to the Pro Bowl after catching 87 passes last season.

One of the criticisms of Bledsoe in Buffalo was that he held the ball too long while trying to make a big throw downfield, and Parcells told reporters early in training camp that he wants the quarterback to avoid that impulse and merely make good decisions.

Just as the Bills did, Parcells plans to base the Dallas offense on the running game, with second-year tailback Julius Jones the focus.

"I don't want the onus to be on the quarterback if I can help it," Parcells told the San Antonio News-Express. "I don't want to be in the situation we wound up being in part of the time last year, where the absence of a running game just put too much

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onus on the quarterback to win games."

Bledsoe, who is not doing phone interviews from training camp in Oxnard, Calif., told local reporters he is used to being the one to make plays but that his main focus is to win a championship.

"I got one of those [Super Bowl] rings, but I wasn't on the field when we won it [2001]," he told the Fort Worth Star-Telegram. "And I want to go win a championship and be the guy on the field when it's over."

Chris Cluff: ccluff@seattletimes.com or 206-464-8787

<h3>Dallas at Seahawks </h3>

Bottom line: The Seahawks' exhibition season home opener is a nationally-televised tilt against the Cowboys, who stunned Seattle on "Monday Night Football" last Dec. 6 at Qwest Field with a come-from-behind 43-39 win. Seahawks coaches will continue evaluating to determine who belongs on the final roster. Still, the memory of the Cowboys' win is still fresh. "I will probably never forget that game," Seahawks coach Mike Holmgren said. "That was a tough one." The Seahawks allowed the Cowboys to rally from a 10-point deficit in the final 1:37 of the game, and one of the Cowboys' scores was a touchdown pass that appeared to have been out of bounds but was not reviewed on replay. Fans may be subject to limited security pat downs at all gates.

Jose Miguel Romero

Drew Bledsoe returns to his home state tonight. (0396529243)

---- INDEX REFERENCES ----

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Language: EN

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EDITION: Fourth

Word Count: 1200

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NewsRoom

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8/22/05 Morning News Trib. (Tacoma Wash) C03
2005 WLNR 13230140

News Tribune, The (Tacoma, WA)
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August 22, 2005

Section: SPORTS

Despite no TV, battle for roster spots continues
Tonight's game against the Cowboys won't be televised locally, but it's still important for those trying to make the team.

MIKE SANDO

The Seattle Seahawks' first home exhibition game of 2005 comes with a few changes.

Kickoff at Qwest Field is scheduled for 5 p.m., an hour earlier than regular-season Monday night games.

The Seahawks are urging fans to arrive 90 minutes before kickoff, and not only as a guard against rush-hour traffic.

Fans should also be prepared for more time-consuming pat-downs as part of increased NFL security measures.

Staying home to watch the Seahawks and Dallas Cowboys on TV is not an option in the Puget Sound region. The game did not sell enough tickets to avoid a league-mandated local blackout.

"Preseason is a little different all around the league that way," coach Mike Holmgren said. "We sold a bunch of season tickets, I know that. It's too bad that the people who can't come to the game can't see it on television. But those are the rules."

The game will be broadcast on 710-AM radio.

On the field, the game is a chance for lesser-known players to compete for roster spots. The first wave of cuts is Aug. 30.

A look at a few of the more competitive battles:

* Receiver: Jerheme Urban, Bobby Shaw, Taco Wallace, Jason Willis and Marque Davis could be fighting for a single roster spot.

Darrell Jackson and Bobby Engram are the starters. The team generally keeps six

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players at the position.

Veteran Joe Jurevicius appears well positioned to claim a roster spot, while Holmgren has said he'll save a roster spot for injured receiver Alex Bannister.

Veteran newcomer Jerome Pathon seems to be making a push for a spot. He caught touchdown passes in the scrimmage and exhibition opener.

Holmgren seems to like what second-year pro D.J. Hackett provides as a potential deep threat.

* Safety: John Howell and Terreal Bierria both have starting experience and both are proficient on special teams, but only one appears likely to claim a roster spot.

Howell and Bierria have more experience than free-agent long shots Junior Rosegreen, Jamaal Brimmer and Terry Holley.

Michael Boulware and Ken Hamlin are the starters. Hamlin, who has only recently returned from shoulder surgery, will not play tonight.

Marquand Manuel, who had 19 tackles in 15 games for Seattle last season, has been starting in Hamlin's place.

Seattle kept only three safeties on the final cut last season before claiming Manuel off waivers prior to the first game.

* Linebacker: The team kept seven linebackers last season.

The top eight, in no particular order, are Lofa Tatupu, Niko Koutouvides, Jamie Sharper, Kevin Bentley, D.D. Lewis, Leroy Hill, Tracy White and Isaiah Kacyvenski.

Lewis (concussion) and Hill (knee) will not play tonight. Rookie Cornelius Wortham (hamstring) returned to practice late last week. Free agent Terrence Robinson faces an uphill fight for a spot.

Tatupu is expected to make his NFL debut tonight after missing the exhibition opener to rest a sore hamstring. The rookie second-round choice has shown more savvy than some veterans. Koutouvides has so far started ahead of him.

Sharper was considered a definite starter when Seattle signed him in free agency. His impact has been muted so far.

* Defensive line: Seattle has 16 defensive linemen in camp, but 2004 starters Cedric Woodard (knee) and Rashad Moore (shoulder) remain sidelined by injuries.

Marcus Tubbs and Chuck Darby have emerged as the starting tackles in their absence. Grant Wistrom and Bryce Fisher are the starting ends.

The team appears to lack high-quality depth at defensive end, where Antonio Cochran ranks third on the depth chart. Rookie fifth-round pick Jeb Huckeba has made a favorable impression on coaches, and the team might need him to play this season.

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* Returner: The Cleveland Browns have given receiver and kick returner Andre Davis permission to seek a trade.

And while media reports have named Seattle as a potential suitor, Davis' kick-return numbers are similar to those of Maurice Morris, who has handled returns for Seattle.

Davis has averaged 21.3 yards per kick return during his career. Morris' average is 22.0 yards. Davis has a long return of 95 yards, compared to 97 yards for Morris.

Both players have averaged 5.0 yards per punt return in limited duty.

Pathon and rookie running back Maurice Weeks returned kicks for Seattle during the exhibition opener at New Orleans.

Pathon has not returned kicks regularly since 2000, when he averaged 22.4 yards on 26 returns for Indianapolis.

Ingram and Taco Wallace returned punts against the Saints last week. Shaw has also returned punts in practice.

Extra points

Holmgren did not announce specific plans for playing time tonight. In the second exhibition game last season, the starting offense played three possessions, which took quarterback Matt Hasselbeck into the second quarter. . . .

The list of injured Seattle players expected to miss the game includes: Moore, Woodard, Hamlin, Hill, Lewis, Bannister, tackle Wayne Hunter (knee), cornerback Michael Harden (concussion), running back Jesse Lumsden (hip), fullback Tony Jackson, (shoulder), defensive end Christian Mohr (leg). . . .

Tickets for the game remain available for purchase at 206-622-4295.

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Seahawks Notebook: Backup QB improves focus on playbook**Backup QB improves focus on playbook**

Monday, August 22, 2005

By DANNY O'NEIL
SEATTLE POST-INTELLIGENCER REPORTER

Football players frequently talk about becoming a student of the game.

Seldom do they provide as literal an example as Seneca Wallace did this offseason when he enrolled in a class to sharpen his study habits.

"It wasn't really geared toward offense or anything like that," Wallace said.

It was about improving his visualization and the class helped bring the Seahawks' playbook into sharper focus for Wallace as he prepared for a chance at being the Seahawks' backup quarterback. He will continue to get a heavy dose of preseason playing time when the Seahawks play the Cowboys tonight at Qwest Field.

To say Wallace crammed this summer for his role as backup would be wrong. He's been working at it for more than two years now, evolving from a college quarterback known for his athleticism into an NFL quarterback who is getting compliments for his growing acumen.

"He has attacked becoming good at the position very hard," coach Mike Holmgren said.

If Holmgren's offense were a college class, it would definitely be an upper-division course. Simply calling plays was a challenge for Wallace in his rookie season, which he spent on the practice squad.

"I went from a vanilla offense we ran at Iowa State to an offense here that is very difficult," Wallace said.

Now in his third season, Wallace isn't struggling to remember plays; he's going out and making them. He passed for one touchdown and ran for another in Seattle's preseason opener in New Orleans on Aug. 12. It was a compelling case that Wallace is ready to be the Seahawks' backup quarterback this season, an opportunity Wallace stood eye-to-eye with once Trent Dilfer went to Cleveland.

"I was like, 'Well, it's my opportunity,' " Wallace said. "I'm getting my chance to maybe be the number two guy.

"I just wanted to make sure I took the whole opportunity to do that."

Wallace took a new tack on his preparations this offseason by signing up for a class in Seattle. The lessons were four hours a day, five days a week and lasted about three months. It wasn't like going back to school. It was learning new study habits.

"It was tailored to help you learn to picture things," Wallace said. "When we'd read a paragraph you would have to picture everything in that paragraph."

At times, he used his football playbook. Other times he had to recite facts from something he read.

"It would help you remember those things," Wallace said. "And you would have to tell the person exactly what that was about."

Those memory lessons translated into a memorable performance in Seattle's first preseason game, though it's worth noting it wasn't the first time a preseason performance drew praise. Wallace was complimented by teammates last year after he directed a pair of touchdown drives in a preseason game against Green Bay.

It's all part of the learning curve for a quarterback in Holmgren's offense, and it's a process that Wallace is still studying.

"It will probably take a guy maybe two years to learn," Wallace said of the offense. "But you've got to keep battling and keep battling it and eventually you'll get it."

NOTE: Tonight's preseason game against Dallas is blacked out on television within 75 miles of Seattle because it did not sell out.

Fans attending the game may be subject to limited pat-down searches upon entry to the stadium. The team is encouraging fans to arrive 90 minutes before the 5 p.m. kickoff because of traffic congestion.

Jerome Pathon

Wide receiver

6-0, 195

- **Age:** 29

- **Thumbnail sketch:** For a guy who went to high school only a few hours up the road, Pathon had to take an indirect route to play college football in Seattle. As a high school senior in Vancouver, B.C., Washington was among the schools he sent a videotape of highlights, but the Huskies weren't biting. He went to Acadia University in Nova Scotia. He played so well in a season there that when he sent out another highlight tape it caught the Huskies' interest. In 1998, he was the first of 10 Huskies chosen in the NFL draft, selected No. 32 overall by the Colts. Now in his eighth season in the NFL.

Quick takes

What was your first car?

"Growing up, we didn't have a lot of money, so the first car I got was in college. It was a 1965 Impala, and it had hydraulics on it. It had switches, it had a sound system and it was hilarious."

What CD do you have that would surprise people?

"Led Zeppelin. I've got a best-of collection."

What's the worst job you've ever had?

"Dishwasher, when I was in high school."

Who was the first poster on your wall?

"Jerry Rice."

-- **Danny O'Neil**

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